

SDD/JJD:SK/JAM
F. #2016R01828

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ **APR 26 2017** ★

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

- - - - -X

UNITED STATES OF AMERICA

- against -

ELVIS REDZEPAGIC,

Defendant.

- - - - -X

THE GRAND JURY CHARGES:

INDICTMENT

CR-17 0228

Cr. No. (T. 18, U.S.C., §§ 981(a)(1)(C),
981(a)(1)(G), 2339B(a)(1), 2239B(d), 2 and
3551 et seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

HURLEY, J.
TOMLINSON, M.J.

COUNT ONE

(Attempt to Provide Material Support to a Foreign Terrorist Organization)

1. In or about and between June 2015 and August 2015, both dates being approximate and inclusive, within the Eastern District of New York and the extraterritorial jurisdiction of the United States, the defendant ELVIS REDZEPAGIC, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, including himself, to one or more foreign terrorist organizations, to wit: the Islamic State of Iraq and al-Sham (hereinafter "ISIS") and al-Nusrah Front, which at all relevant times have been designated by the Secretary of State as foreign terrorist organizations, knowing that the organizations were designated terrorist organizations and the organizations had engaged in and were engaging in terrorist activity and terrorism, and the defendant was a national of the United States (as defined in section 101(a)(22) of the Immigration and Nationality Act), and

after the conduct required for this offense occurred, the defendant was found in the United States, the offense occurred in part within the United States, and the offense occurred in and affected interstate and foreign commerce.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d), 2 and 3551 et seq.)

COUNT TWO

(Attempt to Provide Material Support to a Foreign Terrorist Organization)

2. In or about and between September 2016 and October 2016, both dates being approximate and inclusive, within the Eastern District of New York and the extraterritorial jurisdiction of the United States, the defendant ELVIS REDZEPAGIC, together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including personnel, including himself, to one or more foreign terrorist organizations, to wit: ISIS and al-Nusrah Front, which at all relevant times have been designated by the Secretary of State as foreign terrorist organizations, knowing that the organizations were designated terrorist organizations and the organizations had engaged in and were engaging in terrorist activity and terrorism, and the defendant was a national of the United States (as defined in section 101(a)(22) of the Immigration and Nationality Act), and after the conduct required for this offense occurred, the defendant was found in the United States, the offense occurred in part within the United States, and the offense occurred in and affected interstate and foreign commerce.

(Title 18, United States Code, Sections 2339B(a)(1), 2339B(d), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant ELVIS REDZEPAGIC that, upon his conviction of either of the offenses charged herein, the

government will seek forfeiture in accordance with (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any property, real or personal, constituting or derived from proceeds traceable to such offenses, and (b) Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of all assets, foreign or domestic: (i) of any individual, entity, or organization engaged in planning or perpetrating any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization; (ii) acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; (iii) derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism against the United States, citizens or residents of the United States, or their property; or (iv) of any individual, entity or organization engaged in planning or perpetrating any act of international terrorism against any international organization or against any foreign Government.

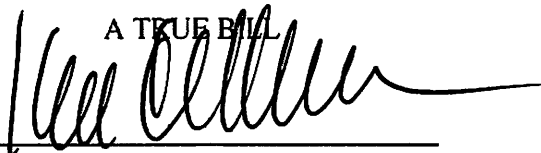
4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or


(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and 981(a)(1)(G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL


FOREPERSON



BRIDGET M. ROHDE
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2016R01828
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ELVIS REDZEPAGIC,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 981(a)(1)(G), 2339B(a)(1), 2339B(d),
2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Saritha Komatireddy and Artie McConnell, Assistant U.S. Attorneys
(718) 254-6054 / (631) 715-7825